THE PAUL WISSMACH GLASS COMPANY, INC.

420 Stephen St., P.O. Box 228 • Paden City, WV 26159 • Phone 304-337-2253 • Fax 304-337-8800
www.wissmachglass.com

June 10, 2016
Project No.: 16-149

Mr. Gregory Fried, Chief
Stationary Source Enforcement Branch
Air Enforcement Division
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

PAUL WISSMACH GLASS COMPANY, INC.
RESPONSE TO LETTER REQUEST
DATED MAY 26, 2016 FROM PHILLIP BROOKS

Dear Mr. Fried:

The Paul Wissmach Glass Company, Inc. (PWG) received a letter from Mr. Phillip Brooks of the United States Environmental Protection Agency (USEPA) dated May 26, 2016 on June 6, 2016 via certified mail.

PWG began operations in Paden City, WV in the early 1900's and has produced Art Glass in flat sheets for decades. Such glass is our only product, except for off specification cullet which is sold to others. The facility glass melting process has been in place for essentially a century and all melting chambers for melting glass are "periodic furnaces" as referenced in the USEPA 40 CFK Part 63.11448 (Subpart SSSSSS) which was published on December 26, 2007. Our melting chambers to which raw materials are manually charged are not continuous furnaces as defined by Subpart SSSSSS. The two (2) types of melting chambers used by PWG are listed below:

1. Pots (Total of eight (8) pots at the facility which receive HAP Metal containing batch).
2. Day Tanks (Total of five (5) day tanks at the facility, but only one (1) has HAP Metal containing batch).

Not all pots are used for melting on a daily basis. Use is based on customer orders and repair needs. The one small day tank is only used with one (1) HAP metal which is manganese. Manganese containing batch is only processed approximately two (2) weeks per year.

These melting chambers which are in use are manually charged (employee with shovel) over an approximately fifteen (15) minute time period up to four (4) times per day (approximately one (1) hour of manual charging time per melting chamber- pot or day tank).

The responses to the Enclosure 2 Information Request are provided below:

1. Description of Glass Products Made – PWG produces multiple colors of glass panels (approximately 34 inches by 90 inches by a few millimeters thick (2 to 5 mm). The products are all considered stained glass. See Attachment 1 for product literature. Provided by Mark Feldmeier.

2. Glass Periodic Melting Chamber Information – PWG has no continuous furnaces. All glass melting involving HAP containing batch is performed in individual unit glass melting chambers (total of 8 pots and 1 small day tank). PWG does not maintain production/operating information by individual melting chamber, nor does it record weight of glass sold. In addition some colored glass is produced using HAP containing cullet (previously produced at PWG at end of glass campaign and held for future use) in lieu of HAP metal compound addition. As a result it is not possible to provide specific records of glass production or repair schedules. Attachment 2 contains a Table Listing of the melting chambers and associated information in response to Question 2 Items a through g. The information provided in the table is based on historic operations and estimates believed to be similar to actual production.

   The information was compiled from knowledge of the process which was provided by Mark Feldmeier and Dan Lynch.

3. Three Year (2013-2015) Summary of Glass Manufacturing Metal HAP Compound Usage – PWG has prepared a Table (See Attachment 3) which provides a listing of the six (6) metal HAPs and the total weight of HAP Compound added to batch for the years 2013 through 2015. The pots used for HAP containing glass melting are also used for non-HAP containing glass melting. The information provided in Attachment 3 does not included non-HAP containing glass melting, but the repair schedule does not distinguish HAP versus non-HAP glass melting usage.

   The information was compiled from individual batch formulations which have not been included and estimates of the number of batches utilizing HAP Metal Compounds as batch ingredients versus cullet to produce the color desired. The estimates are believed to overstate the actual of HAP metal compounds used per year since HAP containing cullet content could not be verified. Provided by Dan Lynch.

4. Emissions Testing – There has been no emissions testing from stacks or vents associated with furnaces or material handling operations. A USEPA Method 22 Performance Visible Emission Observation was performed by PWG's retained Environmental Consultant (MSES Consultants, Inc.) by a Method 9 trained staff member on March 1, 2016. There were no

visible emissions observed. Attachment 4 contains a copy of the MSES report which includes reference to the Visible Emission Observation. Provided by Mark Feldmeier.

5. Emission Reporting to Government Entity – PWG has previously submitted information to Environmental Agencies concerning arsenic usage. PWG has submitted SARA Section 313 required Toxic Release Inventory Reports to USEPA. Attachment 5 contains copies of the reports found in the PWG file. Provided by Mark Feldmeier.

6 Air Emission Permits – Due to the age of the facility and lack of expansion and no product line changes since before the early 1970's, the facility is "grandfathered" with respect to Air Emission permits. The pots and day tanks have been in use since the early 1900's. There are no Environmental Permits for the facility associated with air emissions. Attachment 6 contains letters from our retained environmental consulting firm that discusses this. Provided by Mark Feldmeier.

7. Air Emission Controls for Potential HAP Emissions Associated with Metals Handling – The various metal compounds utilized by PWG are received in small containers of fifty five (55) pounds or less. PWG has a baghouse that services bulk material bins (sand, soda ash, and feldspar) for capture of dust during transfer of the raw materials to the bins. The baghouse also services batch preparation and mixing.

   Metal compounds are the last ingredient added to the batch prior to mixing. This baghouse services the transfer of batch to the batch hoppers which hold the mixed batch until the manual charging is complete.

   While no efficiency data for this baghouse is available in the plant, it is assumed to be 99% efficient at removal of most particle sizes of dust generated during these activities. This efficiency is based on similar baghouse type air pollution control equipment.

   The work practices utilized during the manual charging include:

   a. Closing the damper between the pot and the flue which discharges to a stack during the time of shoveling batch into the chamber.
   b. The temperature of molten glass in the chamber receiving the manual charge is approximately 2,400 degrees F. At this temperature the solid charged batch quickly liquefies thus minimizing fugitive emissions of HAP Particulate to the Stack or work place.
   c. The temperature of the flu/stack system allows for cooling of the process exhaust air prior to discharge to the environment. This cooling allows for condensation of potential metals from the air stream in the flue/stack system.

   This information was prepared by Dan Lynch.

With respect to future operations, PWG is making strides to eliminate the use of arsenic as a batch ingredient.

Paul Wissmach Glass Company, Inc. has determined that the information requested by EPA is not proprietary so no confidentiality claims are made for this response.

Sincerely,

Mark Feldmeier
President

Copy to: Honorable Shelly Moore Capito (US Senate)
Honorable Joe Manchin (US Senate)
Honorable David McKinley (US House of Representatives)
Jessie Adkins (WEVDP)

Attachments

Attachment 1

Products

Attachment 2

Melting Chamber Summary

TABLE 1
Glass Melting Chamber Description/Production Capacity
Paul Wissmach Glass Company, Inc.

Glass Melting Chamber Plant Designation	Type of Melting Chamber	Daily Normal Production Capacity (lb/day)	Production Schedule for Melting Chamber	Weeks of Operation With HAPs			Melting Chamber Repair Schedule	List of Metal HAPs Charged	Glass Production with HAP Content (tons / yr)		
				2013	2014	2015			2013	2014	2015
Small Pots Pot 12 Pot 13	Pot	950 per pot	6 days / week	41 each	41 each	41 each	Approx. every 5 to 6 months the pot is out of service for 3 to 6 weeks	Arsenic Cadmium Chromium Lead Manganese Nickel	234	234	234
Intermediate Pot Pot 11	Pot	1,350	6 days / week	41 each	41 each	41 each	Approx. every 5 to 6 months the pot is out of service for 3 to 6 weeks	Arsenic Cadmium Chromium Lead Manganese Nickel	166	166	166
Large Pots Pot 2 Pot 3 Pot 7 Pot 8 Pot 10	Pot	2,900 per pot	6 days / week	38 each	38 each	38 each	Approx. every 3 to 3.5 months the pot is out of service for 2 to 3 weeks	Arsenic Cadmium Chromium Manganese Nickel	1653	1653	1653
Small Day Tank Tank 5	Day Tank	1,200	2 days /week	2	2	2	1 week	Manganese	2.4	2.4	2.4

Attachment 3

HAP Usage by Year

TABLE 2
METAL HAP USAGE 2013 - 2015
Paul Wissmach Glass

Metal HAP	2013 Usage (pounds)	2014 Usage (pounds)	2015 Usage (pounds)
Arsenic Compounds	400	325	520
Cadmium Compounds	2,337	1,926	2,686
Chromium Compounds	2,700	3,250	3,250
Lead Compounds	1,460	701	3,839
Manganese Compounds	10,650	6,500	7,770
Nickel Compounds	385	325	341

Attachment 4

MSES Report of 3/1/16 Inspection
Including VE

MSES consultants, inc.

609 West Main Street • P.O. Drawer 190 • Clarksburg, WV 26302-0190
304.624.9700 • 304.622.0981 • 304.842.3325 • http://www.msesinc.com
Office Fax 24 Hour World Wide Web

March 7, 2016
Project No.: 16-149

Mr. Mark Feldmeier
The Paul Wissmach Glass Company, Inc.
420 Stephen Street
Paden City, WV 26157

ENVIRONMENTAL REVIEW
THE PAUL WISSMACH GLASS CO., INC.
MARCH 1, 2016

Dear Mr. Feldmeier:

MSES consultants, inc. (MSES) was retained by The Paul Wissmach Glass Company, Inc. (PWG) to conduct a review of plant operations with respect to USEPA and West Virginia DEP regulatory requirements. MSES has previously performed environmental projects for PWG.

The following is a listing of the components of the environmental review conducted on March 1, 2016:

1. Plant Tour
2. Participation in the unannounced WV DEP Office of Air Quality Inspection performed by James Robertson
3. Review of Air Quality Compliance
4. Review of water and stormwater discharge compliance
5. Review of solid waste/ hazardous waste compliance
6. Review of Superfund Amendment Reauthorization Act (SARA) Community Right to Know Compliance

The following sections of this report discuss each of the above listed topics.

Plant Tour/ DEP Inspection

John Keeling of MSES was escorted through the plant by Mark Feldmeier and Dan Lynch of PWG. Just as the tour began, Mr. Lynch was notified that a WV DEP Inspector was at the office and desired to perform an unannounced site inspection. James Robertson, Engineer, of WV DEP Division of Air Quality, met with the above group in the conference room.

Mr. Roberts informed the group that his inspection was a routine periodic inspection. He stated that the last such inspection was conducted in February of 2013. He stated that no community complaint had been received that that his file showed no history of community complaints since some time prior to 2010.

The group visited all areas of the plant with no compliance issues noted. Housekeeping was good and all material storage was orderly. Mr Robertson stated that he would prepare a report of his inspection which would show no compliance concerns noted.

Review of Air Quality Compliance

In addition to the inspection described above, Keeling conducted Method 9 visible emission observations of the facility stacks from adjacent City streets both before entering the plant and at the end of the plant visit. No visible emissions were observed during either of the observation periods.

The PWG facility began operations in the early 1900's and the process has had minimal changes since the 1960's. The facility's air permit status is "Grandfathered" since it was in existence prior to the Regulation 13 Construction permit regulation that was adopted by West Virginia in the early 1970's.

MSES reviewed the USEPA Subpart SSSSSS requirement for Glass Plant Operations which became effective in 2009. This regulation does not apply to PWG since PWG's glass furnaces are not continuous furnaces as defined by the EPA regulation. PWG operates "Day Tanks" and "Pot Furnaces", each of which are manually charged with batch during brief periods each day.

The two (2) baghouses, one in the batch area and the other located in the shipping building, which services the area where a solution is sprayed on the hot flat glass, were observed. Both of the baghouses utilize reverse pulse jet compressed air for bag cleaning. The baghouses appeared to be operating properly during the inspection.

Process and Stormwater Discharge

The facility has an Individual NPDES permit. The only process water discharge from the facility is non-contact cooling water. The source of the cooling water is a water well.

The material handling activity conducted outside the building is limited to bulk material rail car unloading, which involves the use of a belt conveyor to transfer the bulk materials from the rail car pockets to a bucket elevator to a storage silo.

The other bulk material receipt area is the paved area in front of the warehouse building where limestone particles are received by dump bed truck and pay loaded into the building for transfer to the silo. Such shipments are only received in dry weather and all the limestone particles are collected from the unloading area.

Based upon the verbal review of discharge monitoring sample analysis, the facility is in compliance with the NPDES permit.

Review of Solid Waste/ Hazardous Waste Compliance

The facility collects floor sweepings from the batch preparation area, floor sweepings from Day Tank/ Pot Furnace manual charging spillage, and any contaminated batch to use as the raw material to produce "Black Glass." The black glass is sold as a product.

Excess glass from trimming and any breakage is segregated by product and stored for use as cullet in future batches of that product. The fork trucks and other company vehicles are services off site so no waste is generated from maintenance of those vehicles.

Non hazardous packaging waste is the predominant type of waste generated along with spent refractory from furnace/ tank rebuilds. Past analysis of the spent refractory have shown this material to be non-hazardous.

Stack/ flue waste which builts up over time in portions of the exhaust stacks and associated flues has the potential to be hazardous waste, but none has been removed for approximately twenty (20) years. Whenever such waste is generated, it will be assessed to determine the proper disposal method.

Review of Superfund Ammendment Reauthorization Act Community Right to Know

The Superfund Amendment Reauthorization Act (SARA) has two (2) reporting requirements that impact PWG:

1. Tier II Report of Maximum Storage of Chemicals/ Hazardous Materials for previous year – Due on March 1 of each year for chemicals stored above the trigger quantity.
2. Toxic Release Inventory for reporting use of specific chemicals in excess of the reporting/ trigger quantity for the previous year. Electronic reports are due by July 1 for the past year use/ emissions.

Based on our discussions, both reports are prepared and submitted by PWG personnel annually. Dan Lynch will provide the 2015 "metals" usage information to MSES for review.

Summary

Based on the 3/1/16 Environmental Review, PWG is currently complying with the environmental requirements applicable to operations at the facility.

Closing

If additional information is desired, please contact me.

Respectfully Submitted,

John J. Keeling, PE, QEP

Attachment 5

Emission Reporting

Historic Arsenic Correspondence

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

12/22/86

DEC 18 1986

Mr. Robert Feldmeier
General Manager
Paul Wissmach Glass Co., Inc.
Stephen Street
Paden City, WV 26159

Dear Mr. Feldmeier:

This letter is in response to Domhnall OBroins' letter dated November 23, 1986, where he responded for the Paul Wissmach Glass Company, Wissmach Inc., Paden City, West Virginia, regarding the applicability of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Inorganic Arsenic, 40 C.F.R. Part 61, Subpart N.

The determination that the NESHAP for Inorganic Arsenic does not apply to the Wissmach facility is incorrect. Any source that uses inorganic arsenic as a raw material in any amount greater than zero is subject to the regulations. Exempted sources are those which use no arsenic in production or use pot furnaces for manufacturing. See 40 C.F.R. § 61.160(a) and 51 F.R. 27959.

The paragraph which was cited in the letter claiming exemption, 51 F.R. 27959, if read correctly, address the emission test requirement of Method 108 and when a source can opt not to use it. If an existing source adds less than 8.0 Mg (8.8 tons) per year or a new or modified source adds less than 1.0 Mg (1.1 tons) per year, the emission testing of 40 C.F.R. § 61.164 may be excused, but compliance would be shown through the material balance calculation.

Since the information submitted is deficient, we cannot, at this time, determine if Wissmach is an existing or a new modified source, and thus cannot determine which pertinent parts of the regulations apply.

An existing source must comply by either limiting uncontrolled emissions to 2.5 Mg per year, 40 C.F.R. § 61.162(a)(1), or by reducing emissions through use of a control device by at least 85%, § 61.162(a)(2). A new or

modified source must comply by either limiting uncontrolled emissions to 0.4 Mg per year, § 61.162(b)(1), or by reducing emissions through use of a control device by at least 85%, § 61.162(b)(2).

If a source chooses to comply by § 61.162(a)(2) or (b)(2), reducing emissions by at least 85% (whichever is applicable), emission monitoring of § 61.163 and the emission test of § 61.164(e) is required. If a source chooses to comply by § 61.162(a)(1) or (b)(1), uncontrolled emissions (whichever is applicable), depending on how much arsenic is used, compliance must be shown by either §§ 61.164(c) or (d).

Since it is claimed that Wissmach uses a maximum of 2.06 Mg of arsenic per year, which is greater than zero, the regulations are applicable to this source. All applicable sources, based on compliance methods chosen, were to submit the emission calculations of § 61.164(c) or (d) by September 18, 1986, or for those required to conduct an emission test, provide this office with 30 days prior notice of the emission test and submit the results by October 3, 1986. See 40 C.F.R. §§ 61.165(c) and (d).

Regardless of compliance method required or chosen, all sources were to submit an Initial Report with pertinent information by November 2, 1986, as required by 40 C.F.R. § 61.10.

For your information, a modified source is a source defined at 40 C.F.R. § 61.02 and also includes those sources which had stopped arsenic use and then reintroduced its use, which had never used arsenic previously, but then used it after the proposal of the regulations on July 20, 1983, or whose arsenic use has increased above previous levels since before the proposed date.

We urge you to provide pertinent information required to be submitted within 10 days of receipt of this letter with the necessary notices.

If you have any questions, please contact Ronald J. Patterson of my staff at (215) 597-6550.

Sincerely,

Cheryl Wasserman

Cheryl Wasserman, Acting Chief
Air Enforcement Branch

cc: Mr. Domhnall OBroin

COPY

DOMHNALL OBROIN COMPANY
410 FOURTH STREET, WILLIAMSTOWN, WEST VIRGINIA 26187 U.S.A.
(304) 375-6527 TELEX 292368 DOBCO UR

November 23rd, 1986

Ms. Cheryl Wasserman,
Acting Chief of Air Enforcement Branch,
United States Environmental Protection Agency,
Region III,
841 Chestnut Building,
Philadelphia, PA 19107

Ref: 3AM22

Dear Ms. Wasserman,

We have been retained by Mr. Robert Feldmeier, General Manager of The Paul Wissmach Glass Co. Inc., Stephen Street, Paden City, West Virginia 26159 to a) conduct a brief study of their plant at the above address, relative to the NESHAP; Standards for Inorganic Arsenic and b) to respond to your letter dated November 14th (but postmarked November 17th) in light of that study.

The copy of the pertinent pages from the Federal Register / Vol. 51, No. 149 / Monday, August 4th, 1986 / Rules and Regulations, which you enclosed with your letter, clearly states on page 27959, under the heading "Glass Manufacturing Plants":-

> "The standard applies to each glass furnace that uses commercial arsenic as a raw material. The standard for existing glass manufacturing furnaces requires the owner or operator to either: (1) Limit the uncontrolled arsenic emissions to 2.5 megagrams (Mg)(2.75 tons) per year, or less, or (2) reduce total arsenic emissions by 85 percent."

> "Compliance with the emission limit will be determined using Method 108 unless the furnace is exempted. Existing furnaces are exempt from the emission test requirement if less than 8.0 Mg (8.8 tons) of arsenic is added to the furnace annually, and new or modified furnaces are exempt if less than 1.0 Mg (1.1 tons) of arsenic is added annually; and the owner or operator can demonstrate that through a material balance that the applicable emission limit is being met."

In response to your letter and to the NESHAP; Standards for Inorganic Arsenic we submit the following information:-

PURCHASES OF As_2O_3 BY THE PAUL WISSMACH GLASS CO. INC.

1984	0.64 Mg	0.704 tons
1985	2.06 Mg	2.269 tons
1986 (to date)	1.20 Mg	1.323 tons
Average:	1.30 Mg	1.432 tons

Because the company is purchasing, on average, only 1.3 Mg (1.432 tons) of As_2O_3 per annum, they cannot be adding 8.0 Mg (8.8 tons) of As_2O_3 per annum to an existing furnace. If we take 2.06 Mg, the quantity purchased in 1985, they are still using As_2O_3 at only 25.78% of the allowable amount and are, therefore, exempt from the emission test and from the regulation.

Because the company is using a maximum of 2.06 Mg of inorganic arsenic per annum, which is less than the allowable emissions of 2.5 Mg from an existing furnace, a materials balance test to prove emission rates lower than 2.5 Mg per annum is unnecessary.

We submit, therefore, that the furnaces at The Paul Wissmach Glass Co. Inc., are in compliance with and exempt from the National Emission Standard for Hazardous Air Pollutants; Standards for Inorganic Arsenic final rule as published.

Yours sincerely,

Domhnall OBroin

cc: Mr. Robert Feldmeier

DRAFT COPY

HENRY COMMENT

January 16th, 1987

Ms. Cheryl Wasserman,
Acting Chief Air Enforcement Branch,
United States Environmental Protection Agency,
Region III,
841 Chestnut Building,
Philadelphia, PA 19107

Ref: 3AM22

Dear Ms. Wasserman,

With reference to your letters to Mr. Robert Feldmeier, General Manager of The Paul Wissmach Glass Co. Inc., Paden City, WV 26159, we submit the following information in compliance with CFR 40 61.160(a) re Uncontrolled Arsenic Emissions.

The Paul Wissmach Glass Co. was built in 1904 and, since that time, has been involved in the manufacture of stained glass.

PROCESS:

The process of making stained glass involves:

a) Melting a variety of coloured glasses in different furnaces.

b) Using hand held ladles to remove varying quantities of glass from these furnaces.
c) The glass is then dumped out on a water cooled metal plate.

d) Using metal forks, the various coloured glasses are mixed together.
e) The glass is then forced between rolls and extruded as a smooth or textured surface sheet approx. 6'- 0" x 3'- 0'.

When the sheet of glass is rigid it is manually pushed into a lehr for annealing, a process that takes about 1 1/2 hours for the sheet to travel from one end of the lehr to the other.

At the end of the lehr the sheet is inspected, trimmed and packed ready for shipment.

EQUIPMENT:

The Paul Wissmach Glass Company has 14 small furnaces installed. Of these 8 are pot furnaces (each containing one pot) and 6 are small day tanks (maximum capacity about 2400 kg each). There is

no emission control equipment on any of these furnaces since, this being a hand glass plant, they are exempt under NSPS (please see EPA-450/3-79-005b page 2-60 second para.). They use one rolling machine and one lehr.

ARSENIC CONTAINING GLASSES:

The Paul Wissmach Glass Company Inc. melts a wide variety of different coloured glasses of which only four contain arsenic as As_2O_3. We have chosen the glass with the highest volume on which to conduct tests for arsenic loss. Six samples of this glass were submitted to Corning Engineering Laboratory Services for quantitative analysis. Prior to conducting their analysis they call asking for the calculated As_2O_3 content of the resultant glass and they were given a value of 0.223% (0.5 kg As_2O_3 in 224.193 kg of glass). Their analysis shows that 0.22% As_2O_3 is retained in the glass; a loss of approx. 1.345%. A copy of their report is attached.

The amount of As_220_3 used per 268.15 kg of batch is 0.5 kg. Therefore, the amount of As_2O_3 per kg of batch is 0.001864 g/kg. Therefore, the amount of elemental arsenic (As) used per per kg of batch is 0.001864 x 0.75739 (factor for As in As_2O_3) = .0014117 g/kg.

Using the formula in section 61.164(c)(1) to demonstrate compliance with section 61.162(a)(1) we find:

$$T_i = (A_{bi} \times W_{bi}) + (A_{ci} \times W_{ci}) - A_{gi}$$

$$= (.0014117 \times 1.19606) + (0) -).001666$$

$$= 0.0016884 - 0.001666$$

$$= 0.0000224 \text{ g/kg}$$

We estimate that Wissmach will melt 579,204 kg of this batch containing As_23 per annum and this accounts for approximately 93% of their production for glasses containing arsenic. The furnace in which this glass is melted is filled with 9 batches, each weighing 268.15 kg, per working day and that, in a good year, they will work 240 days (9 x 268.15 x 240 = 579,204 kg).

Using the formula in section 61.164(c)(2) to estimate theoretical uncontrolled arsenic emissions for the 12-month period we find:

$$Y_i = (T_i \times G_i) / 10^6$$

$$= (0.0000224 \times 579204) / 10^6$$

$$= 12.974169 / 10^{6)}$$

$$= 0.0000129 \text{ Mg of uncontrolled arsenic emissions per annum}$$

for this glass.

If we assume that the other glasses which contain arsenic have the same retention factor, then the amount of uncontrolled arsenic emissions from this plant is 0.0000138 Mg per annum (0.0000129 / 0.93).

Yours sincerely,

Domhnall OBroin

cc: Mr. Robert Feldmeier

2013 TRI-Lead

Form Status: Certified and Sent to USEPA
Validation Status: Passed w/ Data Quality Alerts

(IMPORTANT: Read instructions before completing form; type or use fill-and-print form)

Form Approved OMB Number: **2025-0009**
Approval Expires:

Page 1 of 5

EPA United States Environmental Protection Agency	**FORM R** Section 313 of the Emergency Planning and Community Right-to-know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act.	TRI Facility ID Number: **2615WPLWSS42STE** Toxic Chemical, Category, or Generic Name: **Lead Compounds**

WHERE TO SEND COMPLETED FORMS:	1. TRI Data Processing Center P.O. Box 10163 Fairfax, VA 22038 ***** File Copy Only: Do Not Submit Paper Form to EPA *****	2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

This section only applies if you are revising or withdrawing a previously submitted form, otherwise leave blank:	Revision (Enter up to two code(s)) [ ][ ]	Withdrawal (Enter up to two code(s)) [ ][ ]

Important: See Instructions to determine when "Not Applicable (NA)" boxes should be checked.

Part I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR : **2013**

SECTION 2. TRADE SECRET INFORMATION

2.1 Are you claiming the toxic chemical identified on page 2 trade secret? [ ] Yes (Answer questions 2.2; attach substantiation forms) [X] NO (Do not answer 2.2; go to Section 3)	2.2 Is this copy [ ] Sanitized [ ] Unsanitized (Answer only if "Yes" in 2.1)	

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official:	Signature:	Date Signed:
File Copy Only: Do Not Submit Paper Form to EPA	**File Copy Only: Do Not Submit Paper Form to EPA**	**XX/XX/XXXX**

SECTION 4. FACILITY IDENTIFICATION

4.1		TRI Facility ID Number	**2615WPLWSS42STE**

Facility or Establishment Name: **PAUL WISSMACH GLASS COMPANY**

Street	Mailing Address (if different from physical street address)	
420 STEPHEN ST	**PO BX 228**	
City/County/Tribe/State/ZIP Code	City/State/ZIP Code	Country (Non-US)
PADEN CITY / Wetzel / BIA Code: / WV / 26159	**PADEN CITY / WV / 26159**	

4.2	This report contains information for : (Important: check a or b; check c or d if applicable)	a. [X] An Entire facility	b. [ ] Part of a facility	c. [ ] A Federal facility	d. [ ] GOCO

4.3	Technical Contact name	**Mark Feldmeier**		Email Address: **wissmach@frontier.com**		Telephone Number (include area code): **304-337-2253**	
4.4	Public Contact name	**Mark Feldmeier**		Email Address: **wissmach@frontier.com**		Telephone Number (include area code): **304-337-2253**	
4.5	NAICS Code(s) (6 digits)	a. **327211 (Primary)**	b.	c.	d.	e.	f.

4.6	Dun and Bradstreet Number(s) (9 digits)
a.	**004331393**
b.	

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of U.S. Parent Company (for TRI Reporting purposes)		No U.S. Parent Company (for TRI Reporting purposes) [X]
5.2	Parent Company's Dun & Bradstreet Number	NA [ ]	

EPA Form 9350-1 (Rev.) - Previous editions are obsolete. Printed using TRIMEweb

EPA FORM R PART II. CHEMICAL - SPECIFIC INFORMATION	TRI Facility ID Number 2615WPLWSS42STE Toxic Chemical, Category, or Generic Name Lead Compounds

SECTION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you are reporting a mixture component in Section 2 below.)

1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.) N420
1.2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.) Lead Compounds
1.3	Generic Chemical Name (Important: Complete only if Part I, Section 2.1 is checked "Yes". Generic Name must be structurally descriptive). NA

SECTION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you completed Section 1 above.)

2.1	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, spaces, and punctuation.) NA

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY
(Important: Check all that apply.)

3.1 Manufacture the toxic chemical:	3.2 Process the toxic chemical:	3.3 Otherwise use the toxic chemical:
a. [ ] Produce b. [ ] Import		
If produce or import: c. [ ] For on-site use/processing d. [ ] For sale/distribution e. [ ] As a byproduct f. [ ] As an impurity	a. [ ] As a reactant b. [ ] As a formulation component c. [ ] As an article component d. [ ] Repackaging e. [ ] As an impurity	a. [ ] As a chemical processing aid b. [X] As a manufacturing aid c. [ ] Ancillary or other use

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

4.1 [03] (Enter two-digit code from instruction package.)

SECTION 5.QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ON-SITE

			A. Total Release (pounds/year*) (Enter range code or estimate**)	B. Basis of Estimate (Enter code)	C. Percent from Stormwater
5.1	Fugitive or non-point air emissions	NA [ ]	0	C	
5.2	Stack or point air emissions	NA [ ]	0.89	C	
5.3	Discharges to receiving streams or water bodies (Enter one name per box)	NA [X]			
	Stream or Water Body Name				
5.3.1	NA				

*For Dioxin and Dioxin-like Compounds, report in grams/year

**Range Codes: A=1-10 pounds; B=11-499 pounds; C=500-999 pounds.

EPA FORM R
PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number: **2615WPLWSS42STE**

Toxic Chemical, Category, or Generic Name: **Lead Compounds**

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ON-SITE (Continued)

		NA	A. Total Release (pounds/year*) (Enter range code** or estimate)	B. Basis of Estimate (Enter code)
5.4-5.5	Disposal to land on-site			
5.4.1	Underground Injection on-site to Class I wells	[X]		
5.4.2	Underground Injection on-site to Class II-V wells	[X]		
5.5.1.A	RCRA subtitle C landfills	[X]		
5.5.1.B	Other landfills	[ ]	1	C
5.5.2	Land treatment/application farming	[X]		
5.5.3A	RCRA Subtitle C surface impoundments	[X]		
5.5.3B	Other surface impoundments	[X]		
5.5.4	Other disposal	[X]		

SECTION 6. TRANSFER(S) OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTWs)	NA [X]

*For Dioxin and Dioxin-like Compounds, report in grams/year

EPA Form 9350-1 (Rev.) - Previous editions are obsolete.

**Range Codes: A=1-10 pounds; B=11-499 pounds; C=500-999 pounds.

EPA FORM R PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)	TRI Facility ID Number 2615WPLWSS42STE Toxic Chemical, Category, or Generic Name Lead Compounds

6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS	NA [X]
6.2.1 Off-Site EPA Identification Number (RCRA ID No.)	
Off-Site Location Name:	NA
Off-Site Address:	

City		County		State		Zip		Country (Non-US)	

Is location under control of reporting facility or parent company?	[ ] Yes [ ] No

A. Total Transfer (pounds/year*) (Enter range code** or estimate)	B. Basis of Estimate (Enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (Enter code)

SECTION 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY

[X] Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (Enter code)	b. Waste Treatment Method(s) Sequence (Enter 3- or 4-character code(s))	c. Waste Treatment Efficiency (Enter 2 character code)

*For Dioxin and Dioxin-like Compounds, report in grams/year

EPA Form 9350-1 (Rev.) - Previous editions are obsolete.

**Range Codes: A=1-10 pounds; B=11-499 pounds; C=500-999 pounds.

EPA FORM R
PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number: **2615WPLWSS42STE**

Toxic Chemical, Category, or Generic Name: **Lead Compounds**

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

[X] NA - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [Enter 3-character code(s)]

SECTION 7C. ON-SITE RECYCLING PROCESSES

[X] NA - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [Enter 3-character code(s)]

SECTION 8. SOURCE REDUCTION AND WASTE MANAGEMENT

		Column A Prior Year (pounds/year*)	Column B Current Reporting Year (pounds/year*)	Column C Following Year (pounds/year*)	Column D Second Following Year (pounds/year*)
8.1					
8.1a	Total on-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills	NA	1	1	1
8.1b	Total other on-site disposal or other releases	NA	.89	.33	.83
8.1c	Total off-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills	NA	NA	NA	NA
8.1d	Total other off-site disposal or other releases	NA	NA	NA	NA
8.2	Quantity used for energy recovery on-site	NA	NA	NA	NA
8.3	Quantity used for energy recovery off-site	NA	NA	NA	NA
8.4	Quantity recycled on-site	NA	NA	NA	NA
8.5	Quantity recycled off-site	NA	NA	NA	NA
8.6	Quantity treated on-site	NA	NA	NA	NA
8.7	Quantity treated off-site	NA	NA	NA	NA
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)		NA		
8.9	Production ratio or activity index		1		
8.10	Did your facility engage in any newly implemented source reduction activities for this chemical during the reporting year? If so, complete the following section; if not, check NA.		NA [X]		

	Source Reduction Activities (Enter code(s))	Methods to Identify Activity (Enter code(s))		
8.10. 1	NA			

EPA Form 9350-1 (Rev.) - Previous editions are obsolete.

*For Dioxin and Dioxin-like Compounds, report in grams/year

TRI Facility ID Number
2615WPLWSS42STE
Toxic Chemical, Category, or Generic Name
Lead Compounds

Additional optional information on source reduction, recycling, or pollution control activities.

Miscellaneous, additional, or optional information regarding the Form R submission
|PRAI:Production of glass containing lead compounds

2014 TRI-Lead

Form Status: Certified and Sent to USEPA
Validation Status: Passed w/ Data Quality Alerts

EPA United States Environmental Protection Agency	**FORM R** Section 313 of the Emergency Planning and Community Right-to-know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act.	TRI Facility ID Number: **2615WPLWSS42STE**; Toxic Chemical, Category, or Generic Name: **Lead Compounds**

WHERE TO SEND COMPLETED FORMS:	1. TRI Data Processing Center P.O. Box 10163 Fairfax, VA 22038 *** File Copy Only: Do Not Submit Paper Form to EPA ***	2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

This section only applies if you are revising or withdrawing a previously submitted form, otherwise leave blank:	Revision (Enter up to two code(s)) [ ][ ]	Withdrawal (Enter up to two code(s)) [ ][ ]

Important: See Instructions to determine when "Not Applicable (NA)" boxes should be checked.

Part I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR : **2014**

SECTION 2. TRADE SECRET INFORMATION

2.1 Are you claiming the toxic chemical identified on page 2 trade secret? [ ] Yes (Answer questions 2.2; attach substantiation forms) [X] NO (Do not answer 2.2; go to Section 3)	2.2 Is this copy [ ] Sanitized [ ] Unsanitized (Answer only if "Yes" in 2.1)	

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official:	Signature:	Date Signed:
File Copy Only: Do Not Submit Paper Form to EPA	**File Copy Only: Do Not Submit Paper Form to EPA**	**XX/XX/XXXX**

SECTION 4. FACILITY IDENTIFICATION

4.1		TRI Facility ID Number	**2615WPLWSS42STE**

Facility or Establishment Name: **PAUL WISSMACH GLASS COMPANY**

Street	Mailing Address (if different from physical street address)
420 STEPHEN ST	**PO BX 228**

City/County/Tribe/State/ZIP Code	City/State/ZIP Code	Country (Non-US)
PADEN CITY / Wetzel / BIA Code: / WV / 26159	**PADEN CITY / WV / 26159**	

4.2	This report contains information for : (Important: check a or b; check c or d if applicable)	a. [X] An Entire facility	b. [ ] Part of a facility	c. [ ] A Federal facility	d. [ ] GOCO

4.3	Technical Contact name	**Mark Feldmeier**	Email Address: **wissmach@frontier.com**	Telephone Number (include area code and ext.): **304-337-2253 - 2253**	
4.4	Public Contact name	**Mark Feldmeier**	Email Address: **wissmach@frontier.com**	Telephone Number (include area code and ext.): **304-337-2253**	
4.5	NAICS Code(s) (6 digits)	a. **327211 (Primary)**	b.	c.	d.
		e.	f.		

4.6 Dun and Bradstreet Number(s) (9 digits)

a. **004331393**

b.

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of U.S. Parent Company (for TRI Reporting purposes)		No U.S. Parent Company (for TRI Reporting purposes) [X]
5.2	Parent Company's Dun & Bradstreet Number	NA [ ]	

EPA FORM R PART II. CHEMICAL - SPECIFIC INFORMATION	TRI Facility ID Number 2615WPLWSS42STE Toxic Chemical, Category, or Generic Name Lead Compounds

SECTION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you are reporting a mixture component in Section 2 below.)

1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.) N420
1.2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.) Lead Compounds
1.3	Generic Chemical Name (Important: Complete only if Part I, Section 2.1 is checked "Yes". Generic Name must be structurally descriptive). NA

SECTION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you completed Section 1 above.)

2.1	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, spaces, and punctuation.) NA

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY
(Important: Check all that apply.)

3.1 Manufacture the toxic chemical:	3.2 Process the toxic chemical:	3.3 Otherwise use the toxic chemical:
a. [ ] Produce b. [ ] Import		
If produce or import: c. [ ] For on-site use/processing d. [ ] For sale/distribution e. [ ] As a byproduct f. [ ] As an impurity	a. [ ] As a reactant b. [ ] As a formulation component c. [ ] As an article component d. [ ] Repackaging e. [ ] As an impurity	a. [ ] As a chemical processing aid b. [X] As a manufacturing aid c. [ ] Ancillary or other use

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

4.1 [02] (Enter two-digit code from instruction package.)

SECTION 5.QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ON-SITE

			A. Total Release (pounds/year*) (Enter range code or estimate**)	B. Basis of Estimate (Enter code)	C. Percent from Stormwater
5.1	Fugitive or non-point air emissions	NA [ ]	0	C	
5.2	Stack or point air emissions	NA [ ]	0.33	C	
5.3	Discharges to receiving streams or water bodies (Enter one name per box)	NA [X]			
	Stream or Water Body Name	Reach Code (optional)			
5.3.1	NA				

*For Dioxin and Dioxin-like Compounds, report in grams/year
**Range Codes: A=1-10 pounds; B=11-499 pounds; C=500-999 pounds.

EPA FORM R
PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number: **2615WPLWSS42STE**

Toxic Chemical, Category, or Generic Name: **Lead Compounds**

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ON-SITE (Continued)

		NA	A. Total Release (pounds/year*) (Enter range code** or estimate)	B. Basis of Estimate (Enter code)
5.4-5.5	Disposal to land on-site			
5.4.1	Class I Underground Injection wells	[X]		
5.4.2	Class II-V Underground Injection wells	[X]		
5.5.1.A	RCRA subtitle C landfills	[X]		
5.5.1.B	Other landfills	[X]		
5.5.2	Land treatment/application farming	[X]		
5.5.3A	RCRA Subtitle C surface impoundments	[X]		
5.5.3B	Other surface impoundments	[X]		
5.5.4	Other disposal	[X]		

SECTION 6. TRANSFER(S) OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTWs)	NA [X]

*For Dioxin and Dioxin-like Compounds, report in grams/year

**Range Codes: A=1-10 pounds; B=11-499 pounds; C=500-999 pounds.

EPA FORM R PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)	TRI Facility ID Number 2615WPLWSS42STE Toxic Chemical, Category, or Generic Name Lead Compounds

6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS	NA [ ]
6.2.1 Off-Site EPA Identification Number (RCRA ID No.)	WV0000561670
Off-Site Location Name:	WETZEL COUNTY LANDFILL
Off-Site Address:	CIDER RUN, RT 1 BOX 156A

City	NEW MARTINSVILLE	County	Wetzel	State	WV	Zip	26155	Country (Non-US)	

Is location under control of reporting facility or parent company?	[ ] Yes [X] No

A. Total Transfer (pounds/year*) (Enter range code** or estimate)	B. Basis of Estimate (Enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (Enter code)
1 . 1	1 . C	1 . M64

SECTION 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY

[X] Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (Enter code)	b. Waste Treatment Method(s) Sequence (Enter 3- or 4-character code(s))	c. Waste Treatment Efficiency (Enter 2 character code)

*For Dioxin and Dioxin-like Compounds, report in grams/year

**Range Codes: A=1-10 pounds; B=11-499 pounds; C=500-999 pounds.

EPA FORM R
PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number: **2615WPLWSS42STE**

Toxic Chemical, Category, or Generic Name: **Lead Compounds**

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

[X] NA - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [Enter 3-character code(s)]

SECTION 7C. ON-SITE RECYCLING PROCESSES

[X] NA - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [Enter 3-character code(s)]

SECTION 8. SOURCE REDUCTION AND WASTE MANAGEMENT

		Column A Prior Year (pounds/year*)	Column B Current Reporting Year (pounds/year*)	Column C Following Year (pounds/year*)	Column D Second Following Year (pounds/year*)
8.1 - 8.7 Production-Related Waste Managed					
8.1a	Total on-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills	NA	NA	NA	NA
8.1b	Total other on-site disposal or other releases	.89	.33	.93	.93
8.1c	Total off-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills	1	1	1	1
8.1d	Total other off-site disposal or other releases	NA	NA	NA	NA
8.2	Quantity used for energy recovery on-site	NA	NA	NA	NA
8.3	Quantity used for energy recovery off-site	NA	NA	NA	NA
8.4	Quantity recycled on-site	NA	NA	NA	NA
8.5	Quantity recycled off-site	NA	NA	NA	NA
8.6	Quantity treated on-site	NA	NA	NA	NA
8.7	Quantity treated off-site	NA	NA	NA	NA
8.8	Non-production-related waste managed**		NA		
8.9	[X] Production ratio or [ ] Activity ratio (select one and enter value to right)		0.41		
8.10	Did your facility engage in any newly implemented source reduction activities for this chemical during the reporting year? If so, complete the following section; if not, check NA.		NA [X]		

	Source Reduction Activities (Enter code(s))	Methods to Identify Activity (Enter code(s))			Estimated annual reduction (Enter code (s)) (optional)
8.10. 1	NA				

*For Dioxin and Dioxin-like Compounds, report in grams/year

** Includes quantities released to the environment or transferred off-site as a result of remedial actions, catastrophic events, or other one-time events not associated with production processes

TRI Facility ID Number
2615WPLWSS42STE
Toxic Chemical, Category, or Generic Name
Lead Compounds

Section 8.11: If you wish to submit additional optional information on source reduction, recycling, or pollution control activities, provide it here.	
Topic	**Comment**

Section 9.1: If you wish to submit any miscellaneous, additional, or optional information regarding your Form R submission, provide it here.	
Topic	**Comment**
Production or Activity Variable	Pounds of glass that contained lead compounds

2015 TRI-Lead

Form Status: Certified and Sent to USEPA
Validation Status: Passed with No Errors

EPA United States Environmental Protection Agency	**FORM R** Section 313 of the Emergency Planning and Community Right-to-know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act.	TRI Facility ID Number: **2615WPLWSS42STE**; Toxic Chemical, Category, or Generic Name: **Lead Compounds**

WHERE TO SEND COMPLETED FORMS:	1. TRI Data Processing Center P.O. Box 10163 Fairfax, VA 22038 *** File Copy Only: Do Not Submit Paper Form to EPA ***	2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)

This section only applies if you are revising or withdrawing a previously submitted form, otherwise leave blank:	Revision (Enter up to two code(s)) [RR3][ ]	Withdrawal (Enter up to two code(s)) [ ][ ]

Important: See Instructions to determine when "Not Applicable (NA)" boxes should be checked.

Part I. FACILITY IDENTIFICATION INFORMATION

SECTION 1. REPORTING YEAR : **2015**

SECTION 2. TRADE SECRET INFORMATION

2.1 Are you claiming the toxic chemical identified on page 2 trade secret? [ ] Yes (Answer questions 2.2; attach substantiation forms) [X] NO (Do not answer 2.2; go to Section 3)	2.2 Is this copy [ ] Sanitized [ ] Unsanitized (Answer only if "Yes" in 2.1)	

SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official:	Signature:	Date Signed:
File Copy Only: Do Not Submit Paper Form to EPA	File Copy Only: Do Not Submit Paper Form to EPA	XX/XX/XXXX

SECTION 4. FACILITY IDENTIFICATION

4.1		TRI Facility ID Number	2615WPLWSS42STE

Facility or Establishment Name: **PAUL WISSMACH GLASS COMPANY**

Street	Mailing Address (if different from physical street address)
420 STEPHEN ST	PO BX 228
City/County/Tribe/State/ZIP Code: PADEN CITY / Wetzel / BIA Code: / WV / 26159	City/State/ZIP Code: PADEN CITY / WV / 26159 — Country (Non-US):

4.2	This report contains information for : (Important: check a or b; check c or d if applicable)	a. [X] An Entire facility	b. [ ] Part of a facility	c. [ ] A Federal facility	d. [ ] GOCO

4.3	Technical Contact name	Mark Feldmeier		Email Address: wissmach@frontier.com		Telephone Number (include area code and ext.): 304-337-2253	
4.4	Public Contact name	Mark Feldmeier		Email Address: wissmach@frontier.com		Telephone Number (include area code and ext.): 304-337-2253	
4.5	NAICS Code(s) (6 digits)	a. 327211 (Primary)	b.	c.	d.	e.	f.

4.6	Dun and Bradstreet Number(s) (9 digits)
a.	004331393
b.	

SECTION 5. PARENT COMPANY INFORMATION

5.1	Name of U.S. Parent Company (for TRI Reporting purposes)		No U.S. Parent Company (for TRI Reporting purposes) [X]
5.2	Parent Company's Dun & Bradstreet Number	NA [ ]	

EPA FORM R PART II. CHEMICAL - SPECIFIC INFORMATION	TRI Facility ID Number 2615WPLWSS42STE Toxic Chemical, Category, or Generic Name Lead Compounds

SECTION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you are reporting a mixture component in Section 2 below.)

1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.) N420
1.2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.) Lead Compounds
1.3	Generic Chemical Name (Important: Complete only if Part I, Section 2.1 is checked "Yes". Generic Name must be structurally descriptive). NA

SECTION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you completed Section 1 above.)

2.1	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, spaces, and punctuation.) NA

SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY
(Important: Check all that apply.)

3.1 Manufacture the toxic chemical:	3.2 Process the toxic chemical:	3.3 Otherwise use the toxic chemical:
a. [ ] Produce b. [ ] Import		
If produce or import: c. [ ] For on-site use/processing d. [ ] For sale/distribution e. [ ] As a byproduct f. [ ] As an impurity	a. [ ] As a reactant b. [ ] As a formulation component c. [ ] As an article component d. [ ] Repackaging e. [ ] As an impurity	a. [ ] As a chemical processing aid b. [X] As a manufacturing aid c. [ ] Ancillary or other use

SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

4.1 [03] (Enter two-digit code from instruction package.)

SECTION 5.QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ON-SITE

			A. Total Release (pounds/year*) (Enter range code or estimate**)	B. Basis of Estimate (Enter code)	C. Percent from Stormwater
5.1	Fugitive or non-point air emissions	NA [X]			
5.2	Stack or point air emissions	NA [ ]	1.91	C	
5.3	Discharges to receiving streams or water bodies (Enter one name per box)	NA [X]			
	Stream or Water Body Name	Reach Code (optional)			
5.3.1	NA				

*For Dioxin and Dioxin-like Compounds, report in grams/year
**Range Codes: A=1-10 pounds; B=11-499 pounds; C=500-999 pounds.

EPA FORM R
PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)

TRI Facility ID Number: **2615WPLWSS42STE**

Toxic Chemical, Category, or Generic Name: **Lead Compounds**

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ON-SITE (Continued)

		NA	A. Total Release (pounds/year*) (Enter range code** or estimate)	B. Basis of Estimate (Enter code)
5.4-5.5	Disposal to land on-site			
5.4.1	Class I Underground Injection wells	[X]		
5.4.2	Class II-V Underground Injection wells	[X]		
5.5.1.A	RCRA subtitle C landfills	[X]		
5.5.1.B	Other landfills	[X]		
5.5.2	Land treatment/application farming	[X]		
5.5.3A	RCRA Subtitle C surface impoundments	[X]		
5.5.3B	Other surface impoundments	[X]		
5.5.4	Other disposal	[X]		

SECTION 6. TRANSFER(S) OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS

6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTWs)	NA [X]

*For Dioxin and Dioxin-like Compounds, report in grams/year

**Range Codes: A=1-10 pounds; B=11-499 pounds; C=500-999 pounds.

EPA FORM R PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)	TRI Facility ID Number 2615WPLWSS42STE Toxic Chemical, Category, or Generic Name Lead Compounds

6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS	NA [ ]
6.2.1 Off-Site EPA Identification Number (RCRA ID No.)	WV0000561670
Off-Site Location Name:	WETZEL COUNTY LANDFILL
Off-Site Address:	CIDER RUN, RT 1 BOX 156A

City	NEW MARTINSVILLE	County	Wetzel	State	WV	Zip	26155	Country (Non-US)	

Is location under control of reporting facility or parent company?	[ ] Yes [X] No

A. Total Transfer (pounds/year*) (Enter range code** or estimate)	B. Basis of Estimate (Enter code)	C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (Enter code)
1 . 2.3	1 . C	1 . M64

SECTION 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY

[X] Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.

a. General Waste Stream (Enter code)	b. Waste Treatment Method(s) Sequence (Enter 3- or 4-character code(s))	c. Waste Treatment Efficiency (Enter 2 character code)

*For Dioxin and Dioxin-like Compounds, report in grams/year

**Range Codes: A=1-10 pounds; B=11-499 pounds; C=500-999 pounds.

EPA FORM R PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)	TRI Facility ID Number 2615WPLWSS42STE Toxic Chemical, Category, or Generic Name Lead Compounds

SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES

[X] NA - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category.

Energy Recovery Methods [Enter 3-character code(s)]

SECTION 7C. ON-SITE RECYCLING PROCESSES

[X] NA - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category.

Recycling Methods [Enter 3-character code(s)]

SECTION 8. SOURCE REDUCTION AND WASTE MANAGEMENT

		Column A Prior Year (pounds/year*)	Column B Current Reporting Year (pounds/year*)	Column C Following Year (pounds/year*)	Column D Second Following Year (pounds/year*)
8.1 - 8.7 Production-Related Waste Managed					
8.1a	Total on-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills	NA	NA	NA	NA
8.1b	Total other on-site disposal or other releases	.33	1.91	1.91	1.91
8.1c	Total off-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills	1	2.3	2.3	2.3
8.1d	Total other off-site disposal or other releases	NA	NA	NA	NA
8.2	Quantity used for energy recovery on-site	NA	NA	NA	NA
8.3	Quantity used for energy recovery off-site	NA	NA	NA	NA
8.4	Quantity recycled on-site	NA	NA	NA	NA
8.5	Quantity recycled off-site	NA	NA	NA	NA
8.6	Quantity treated on-site	NA	NA	NA	NA
8.7	Quantity treated off-site	NA	NA	NA	NA
8.8	Non-production-related waste managed**		NA		
8.9	[X] Production ratio or [ ] Activity ratio (select one and enter value to right)		1		
8.10	Did your facility engage in any newly implemented source reduction activities for this chemical during the reporting year? If so, complete the following section; if not, check NA.		NA [X]		

	Source Reduction Activities (Enter code(s))	Methods to Identify Activity (Enter code(s))			Estimated annual reduction (Enter code (s)) (optional)
8.10. 1	NA				

*For Dioxin and Dioxin-like Compounds, report in grams/year

** Includes quantities released to the environment or transferred off-site as a result of remedial actions, catastrophic events, or other one-time events not associated with production processes

TRI Facility ID Number
2615WPLWSS42STE
Toxic Chemical, Category, or Generic Name
Lead Compounds

Section 8.11: If you wish to submit additional optional information on source reduction, recycling, or pollution control activities, provide it here.	
Topic	**Comment**

Section 9.1: If you wish to submit any miscellaneous, additional, or optional information regarding your Form R submission, provide it here.	
Topic	**Comment**
Production or Activity Variable	Pounds of glass containing lead compounds

Attachment 6

MSES Report of 3/1/16 Site Visit

MSES consultants, inc.

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March 7, 2016
Project No.: 16-149

Mr. Mark Feldmeier
The Paul Wissmach Glass Company, Inc.
420 Stephen Street
Paden City, WV 26157

ENVIRONMENTAL REVIEW
THE PAUL WISSMACH GLASS CO., INC.
MARCH 1, 2016

Dear Mr. Feldmeier:

MSES consultants, inc. (MSES) was retained by The Paul Wissmach Glass Company, Inc. (PWG) to conduct a review of plant operations with respect to USEPA and West Virginia DEP regulatory requirements. MSES has previously performed environmental projects for PWG.

The following is a listing of the components of the environmental review conducted on March 1, 2016:

1. Plant Tour
2. Participation in the unannounced WV DEP Office of Air Quality Inspection performed by James Robertson
3. Review of Air Quality Compliance
4. Review of water and stormwater discharge compliance
5. Review of solid waste/ hazardous waste compliance
6. Review of Superfund Amendment Reauthorization Act (SARA) Community Right to Know Compliance

The following sections of this report discuss each of the above listed topics.

Plant Tour/ DEP Inspection

John Keeling of MSES was escorted through the plant by Mark Feldmeier and Dan Lynch of PWG. Just as the tour began, Mr. Lynch was notified that a WV DEP Inspector was at the office and desired to perform an unannounced site inspection. James Robertson, Engineer, of WV DEP Division of Air Quality, met with the above group in the conference room.

Mr. Roberts informed the group that his inspection was a routine periodic inspection. He stated that the last such inspection was conducted in February of 2013. He stated that no community complaint had been received that that his file showed no history of community complaints since some time prior to 2010.

The group visited all areas of the plant with no compliance issues noted. Housekeeping was good and all material storage was orderly. Mr Robertson stated that he would prepare a report of his inspection which would show no compliance concerns noted.

Review of Air Quality Compliance

In addition to the inspection described above, Keeling conducted Method 9 visible emission observations of the facility stacks from adjacent City streets both before entering the plant and at the end of the plant visit. No visible emissions were observed during either of the observation periods.

The PWG facility began operations in the early 1900's and the process has had minimal changes since the 1960's. The facility's air permit status is "Grandfathered" since it was in existence prior to the Regulation 13 Construction permit regulation that was adopted by West Virginia in the early 1970's.

MSES reviewed the USEPA Subpart SSSSSS requirement for Glass Plant Operations which became effective in 2009. This regulation does not apply to PWG since PWG's glass furnaces are not continuous furnaces as defined by the EPA regulation. PWG operates "Day Tanks" and "Pot Furnaces", each of which are manually charged with batch during brief periods each day.

The two (2) baghouses, one in the batch area and the other located in the shipping building, which services the area where a solution is sprayed on the hot flat glass, were observed. Both of the baghouses utilize reverse pulse jet compressed air for bag cleaning. The baghouses appeared to be operating properly during the inspection.

Process and Stormwater Discharge

The facility has an Individual NPDES permit. The only process water discharge from the facility is non-contact cooling water. The source of the cooling water is a water well.

The material handling activity conducted outside the building is limited to bulk material rail car unloading, which involves the use of a belt conveyor to transfer the bulk materials from the rail car pockets to a bucket elevator to a storage silo.

The other bulk material receipt area is the paved area in front of the warehouse building where limestone particles are received by dump bed truck and pay loaded into the building for transfer to the silo. Such shipments are only received in dry weather and all the limestone particles are collected from the unloading area.

Based upon the verbal review of discharge monitoring sample analysis, the facility is in compliance with the NPDES permit.

Review of Solid Waste/ Hazardous Waste Compliance

The facility collects floor sweepings from the batch preparation area, floor sweepings from Day Tank/ Pot Furnace manual charging spillage, and any contaminated batch to use as the raw material to produce "Black Glass." The black glass is sold as a product.

Excess glass from trimming and any breakage is segregated by product and stored for use as cullet in future batches of that product. The fork trucks and other company vehicles are services off site so no waste is generated from maintenance of those vehicles.

Non hazardous packaging waste is the predominant type of waste generated along with spent refractory from furnace/ tank rebuilds. Past analysis of the spent refractory have shown this material to be non-hazardous.

Stack/ flue waste which builts up over time in portions of the exhaust stacks and associated flues has the potential to be hazardous waste, but none has been removed for approximately twenty (20) years. Whenever such waste is generated, it will be assessed to determine the proper disposal method.

Review of Superfund Ammendment Reauthorization Act Community Right to Know

The Superfund Amendment Reauthorization Act (SARA) has two (2) reporting requirements that impact PWG:

1. Tier II Report of Maximum Storage of Chemicals/ Hazardous Materials for previous year – Due on March 1 of each year for chemicals stored above the trigger quantity.
2. Toxic Release Inventory for reporting use of specific chemicals in excess of the reporting/ trigger quantity for the previous year. Electronic reports are due by July 1 for the past year use/ emissions.

Based on our discussions, both reports are prepared and submitted by PWG personnel annually. Dan Lynch will provide the 2015 "metals" usage information to MSES for review.

Summary

Based on the 3/1/16 Environmental Review, PWG is currently complying with the environmental requirements applicable to operations at the facility.

Closing

If additional information is desired, please contact me.

Respectfully Submitted,

John J. Keeling, PE, QEP